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Counsel to Official Committee of Unsecured
Creditors

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

SeaPort Airlines, Inc.

Debtor.

Case No. 16-30406-tmb11

OBJECTION TO DEBTOR'S MOTION TO
EXTEND EXCLUSIVITY PERIODS
PURSUANT TO 11 U.S.C. § 1121(d) AND
TO EXTEND DEADLINE TO FILE
DISCLOSURE STATEMENT AND PLAN
OF REORGANIZATION

The Official Committee of Unsecured Creditors (the "Committee") for its objection to the Debtor's Motion to Extend Exclusivity Periods Pursuant to 11 U.S.C. § 1121(d) and to Extend Deadline to File Disclosure Statement and Plan of Reorganization (ECF No. 277) filed by SeaPort Airlines, Inc. ("SeaPort" or the "Debtor") states as follows:

OBJECTION

1. The Debtor's Disclosure Statement and Plan of Reorganization are due on June 6, 2016 (ECF No. 234).

2. The Debtor requests a 60-day extension of the plan filing deadline and exclusivity period under 11 U.S.C. § 1121. The Committee understands that the Debtor has retained Embark to assist it in analyzing plan issues and preparing a plan. Embark is scheduled to present its report to the Debtor's board on June 2, 2016.

1 3. The Committee believes the Debtor has not established the need for a 60-day
2 extension. A 30-day extension to July 6, 2016 would provide the Debtor and Embark with a full
3 month following the presentation of the Embark report – and approximately two months from
4 today – for the Debtor to prepare a plan for filing.

5 4. The Committee objects to a 60-day extension but would support a 30-day
6 extension.

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8
9 DATED: May 10, 2016

PERKINS COIE LLP

By: /s/ Douglas R. Pahl

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date shown below the foregoing **OBJECTION TO DEBTOR'S MOTION TO EXTEND EXCLUSIVITY PERIODS PURSUANT TO 11 U.S.C. § 1121(d) AND TO EXTEND DEADLINE TO FILE DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION** was electronically filed with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all CM/ECF participants, which includes Debtor's counsel, the United States Trustee's office and parties requesting notice electronically, and a copy of the pleading will be sent via U.S. Mail on the date shown below to the following parties:

Franklin C. Adams POB 1028 Riverside, CA 92502-1028 <i>Creditor San Diego County Regional Airport Authority</i>	Michael J. Edelman 1633 Broadway 47th Floor New York, NY 10019 <i>Creditor Aircraft Lease Finance III</i>
Tulare County Tax Collector Attn Jorge Garcia Depty Tax Collector 221 S Mooney Blvd Rm 104-E Visalia, CA 93291-4593	Mark J. Wolfson 100 N Tampa St #2700 Tampa, FL 33602 <i>Interested Party Airlines Reporting Corp.</i>

DATED this 10th of May, 2016

PERKINS COIE LLP

/s/ Douglas R. Pahl
Douglas R. Pahl, OSB No. 950476

Counsel to Official Committee of Unsecured Creditors